

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

THE UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
vs.)	
)	4:15CR00049 CDP/DDN
)	
MEDIHA SALKICEVIC,)	
)	
Defendant.)	

MOTION TO WITHDRAW AND FOR APPOINTMENT OF NEW COUNSEL

COMES NOW undersigned counsel, J. Christian Goeke and respectfully requests leave of Court to withdraw as attorney for Defendant Mediha Salkicevic. Further, counsel requests the Court appoint substitute counsel for Defendant. In support thereof, counsel states as follows:

1. Counsel was appointed to represent Defendant as co-counsel pursuant to the Criminal Justice Act (CJA) and has been acting in that capacity since June 2017.
2. Counsel has accepted a position with the Justice Department and will be employed as an Assistant United States Attorney in the Eastern District of Missouri.
3. This position creates an unavoidable conflict and prevents counsel from continuing to represent Defendant in this matter.
4. Defendant is in custody and being held in the Ste. Genevieve County jail. Counsel has notified co-counsel, Andrea Gambino, of this conflict and of counsel's intention to withdraw.
5. Counsel will advise Defendant of his withdrawal and provide her with a copy of this motion.

6. Counsel is therefore requesting this Court grant him leave to withdraw, and further that new co-counsel be appointed to represent Defendant pursuant to the CJA.

WHEREFORE, for the foregoing stated reasons, undersigned counsel respectfully requests that he be allowed to withdraw as attorney for Defendant and further that new co-counsel be appointed in his place.

Respectfully Submitted,

/s/ J. Christian Goeke
J. Christian Goeke #39462MO
7711 Bonhomme Avenue
Suite 850
Clayton, MO 63105
(314) 862-5110
(314) 862-5943- Facsimile
chris@jcgoekelaw.com

CERTIFICATE OF SERVICE

Signature of the foregoing document is also certification that a true and correct copy has been filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record on this 23rd day of July, 2018.

/s/ J. Christian Goeke
J. Christian Goeke #39462MO
Attorney for Defendant